

June 8, 2017

Via ECF

The Honorable Judge Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Application of Hornbeam Corporation – 1:14-mc-00424-P1 – Correction to Applicants' Motion for Intervention and to Amend the Court's Protective Order*

Dear Judge Broderick:

We write on behalf of 28 U.S.C. § 1782 discovery applicants Hornbeam Corporation ("Hornbeam") and proposed intervenor Vadim Shulman ("Shulman") ("Applicants") to bring an error to the Court's attention relating to Applicants' previously submitted motion for Shulman's intervention and to amend the Protective Order (doc. no. 115) (the "Motion"). In the Motion, Applicants incorrectly stated that they were moving on behalf of both Applicants and Bracha Foundation ("Bracha"). Bracha, which is an entity beneficially owned by Shulman, is a party to Hornbeam's related § 1782 action pending before the U.S. District Court in the Northern District of Alabama, but is not a party to this action. Applicants apologize for any confusion caused by this error.

Respectfully submitted,



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